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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Ilsa Saravia, as next friend for A.H., a
minor, on behalf of herself individually and
others similarly situated,

Plaintiff,
v.
William Barr, Attorney General, et al.,

Defendants.

Case No. 3:17-cv-03615-VC

**DECLARATION OF STEPHEN B. KANG IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Stephen B. Kang, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and a member
3 of the Bar of this Court. I am one of the attorneys for the Plaintiff and the provisionally certified Class
4 in this action.

5 2. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class
6 Action Settlement. I have personal knowledge of the facts set forth below and, if called as a witness
7 to testify, could and would testify competently thereto.

8 3. Pursuant to the terms of the Settlement Agreement preliminarily approved by this
9 Court, I and other members of Plaintiff's counsel team undertook the following efforts to provide
10 notice to known and potential Class Members in this case, as well as their attorneys.

11 4. Since the Court granted the preliminary injunction in this case, various members of
12 Plaintiff's counsel team have been in touch with dozens of attorneys who have represented class
13 members in Saravia Hearings or in their immigration proceedings. On Thursday, October 22, 2020, I
14 sent copies of the Class Notice and Agreement via email to the last known email addresses of all such
15 attorneys.

16 5. That same day, I also sent copies of the Class Notice and Agreement to several major
17 email listservs of attorneys and advocates who represent children in immigration matters, and two
18 major national listservs of immigration practitioners.

19 6. After Defendants compiled their lists of known and potential Class Members and
20 attorneys pursuant to Paragraph VIII.C.2.a of the Settlement Agreement, and provided those lists to
21 Class Members, a paralegal under my supervision and I reviewed those lists to identify any attorneys
22 who we had not reached during the prior round of email distribution. Plaintiff's counsel, including
23 lawyers from the ACLU, NYCLU, and the law offices of Holly Cooper, emailed and called those
24 attorneys to ensure that they were aware of the Agreement's preliminary approval.

25 7. Plaintiff's counsel also caused copies of the Class Notice (in English and Spanish) and
26 the Settlement Agreement to be posted on the websites of the National ACLU, the ACLU of Northern
27 California, and the New York Civil Liberties Union.

8. Pursuant to Paragraph VIII.3.b of the Agreement, Plaintiff's counsel also met and conferred with Defendants' counsel via email concerning ORR and DHS facilities where the Class Notice should be posted.

I declare under penalty of perjury that the foregoing is true and correct. Executed December 30, 2020 at Vienna, Virginia.

/s/ Stephen B. Kang

Stephen B. Kang

ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)

Pursuant to N. D. Cal. Civ. L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatory.

Dated: December 30, 2020

/s/ Martin Schenker

Martin Schenker